

142 Joralemon Street, Ste. 5A
Brooklyn, New York, 11201
Tel: (718) 875-1850
Fax: (718) 875-1931
coblack@gmail.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

_____)	
Cress et al,)	Case No.: 08-1873 (NLH)
Plaintiff,)	
vs.,)	Proposed Order
Ventnor City et al.,)	
Defendants.)	
_____)	

This matter having come before the Court and for the reasons set forth on the record on February 24, 2013.

IT IS HEREBY ORDERED ON THIS 28th DAY OF FEBRUARY, 2013:

THAT the City of Margate retain the services of FTI Technology Consulting, the consulting firm mutually agreed to by the current parties in this case. FTI consulting shall do the following:

(1) conduct interviews of key individuals within the City of Margate to obtain an understanding of IT-related systems, infrastructure and electronic file storage/maintenance methods;

(2) Determine infrastructure from January 2006 through the present including, but not limited to the following: (a) Archiving and tombstoning

of old machines in office and Mobile devices; and (c) The “CODEE” system; (c) any other system that is utilized by the Margate City Police Department to generate or maintain police reports or other investigative reports related to confidential informants;

(3) investigate and document incident and arrest report databases, confidential informant file data bases including: existence and regular use, details of data entry and editing, archiving and deletion;

(4) investigate and document the “CODEE” data base including existence and regular use, details of data entry and editing, archiving and deletion;

(5) investigate and document any word processing software database or other database used to document information obtained from confidential informants;

(6) if applicable, to visually inspect and document locations of any identified electronically stored information to facilitate subsequent forensic capture;

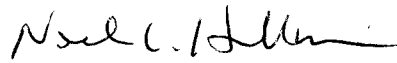
(7) forensically preserve identified electronically stored information deemed relevant to the investigation; generate detailed acquisition summary forms while maintaining chain of custody throughout collections process; and

(8) report post-collection to the Court and the parties including: (a) systems identified and data retention findings; (b) summary report and collected assets; (c) custodians/devices of interest and their contents; and (d) other information as requested by the Court or the parties and authorized by the Court.

IT IS FURTHER ORDERED THAT the discovery produced as a result of this accounting, preservation, and examination is subject to the discovery confidentiality order entered on February 28, 2013.

IT IS FURTHER ORDERED THAT THE FULL COST OF THIS ELECTONIC FORENISC ACCOUNTING, PRESERVATION, AND EXAMNINATION OF THE MARGATE CITY POLICE DEPARTMENT'S ELECTRONICALLY STORED INFORMATION IS TO BE PAID BY THE CITY OF MARGATE.

SO ORDERED THIS 28 DAY OF FEBRUARY, 2013

A handwritten signature in cursive script, appearing to read "Noel L. Hillman", is written above a horizontal line.

NOEL L. HILLMAN, U.S.D.J